

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
COLUMBUS DIVISION**

**JANET DAVIS, ANGEL RANDALL,
MELISSA SCHALLER, MANDY
PHELAN, individually and on behalf of
all others similarly situated,**

Plaintiffs,

v.

**GEICO CASUALTY COMPANY,
a foreign corporation, GEICO
ADVANTAGE INSURANCE
COMPANY, a foreign corporation, and
GEICO CHOICE INSURANCE
COMPANY, a foreign corporation, and
GEICO GENERAL INSURANCE
COMPANY, a foreign corporation,**

Defendants.

CASE NO.: 2:19-cv-02477-GCS-EPD

(JURY TRIAL DEMANDED)

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE
TO FILE SECOND AMENDED CLASS ACTION COMPLAINT**

Plaintiffs Janet Davis, Angel Randall, Melissa Schaller, and Mandy Phelan (collectively, the "Plaintiffs"), on behalf of themselves and all others similarly situated, file, pursuant to Fed. R. Civ. P. 15(a), this Unopposed Motion for Leave to File Second Amended Class Action Complaint. The proposed Second Amended Complaint is attached hereto as Exhibit 1, and seeks to add the claims of new plaintiff Trey Roberts, individually and on behalf of a putative class, against new defendant GEICO Secure Insurance Company ("GEICO Secure"). The grounds for this Motion are fully set forth in Plaintiffs' Memorandum of Law in Support of Unopposed Motion for Leave to File Second Amended Class Action Complaint.

Dated: February 21, 2020

Respectfully submitted,

By: /s/ Daniel R. Karon
Daniel R. Karon (0069304)
Beau D. Hollowell (0080704)
KARON LLC
700 W. St. Clair Ave., Suite 200
Cleveland, OH 44113
Tel: (216) 622-1851
dkaron@karonllc.com
bhollowell@karonllc.com

s/Jacob L. Phillips
Edmund A. Normand (admitted *pro hac vice*)
Jacob L. Phillips (admitted *pro hac vice*)
NORMAND PLLC
Post Office Box 1400036
Orlando, FL 32814-0036
Tel: (407) 603-6031
ed@normandpllc.com
jacob.phillips@normandpllc.com

Bradley W. Pratt (admitted *pro hac vice*)
PRATT CLAY LLC
4401 Northside Parkway
Suite 520
Atlanta, GA 30327
Tel: (404) 949-8118
bradley@prattclay.com

Christopher Hall (*pro hac vice* pending)
HALL & LAMPROS LLP
400 Galleria Parkway
Suite 1150
Atlanta, Georgia 30309
Tel: (404) 876-8100
chall@hallandlampros.com

Andrew Shamis (admitted *pro hac vice*)
SHAMIS & GENTILE, P.A.
14 N.E 1st Ave Ste. 1205
Miami, FL 33132
Tel: (305) 479-2299
ashamis@shamisgentile.com

Scott Edelsberg (admitted *pro hac vice*)
EDELSBERG LAW, P.A.
19495 Biscayne Blvd. #607
Aventura, FL 33180
Tel: (305) 975-3320
Scott@edelsberglaw.com

Rachel Dapeer (admitted *pro hac vice*)
DAPEER LAW, P.A.
300 S. Biscayne Blvd. #2704
Miami, FL 33131
rachel@dapeer.com

Attorneys for Plaintiffs and the class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, February 21, 2020, I electronically filed the foregoing document via this Court's CM/ECF filing system, which will provide electronic notice to all counsel of record.

/s/ Jacob Phillips